

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN, TEXAS

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. 7:13-cr-01154
	§	
HECTOR NICOLAS RODRIGUEZ, SR.	§	

DEFENDANT’S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, HECTOR NICOLAS RODRIGUEZ, SR., Defendant, by and through his attorney, Daniel Quirino Longoria, and files this his Unopposed Motion for Continuance, and for cause would show the Court the following:

I.

Counsel would show that the above numbered is on this Court’s docket for Final Pre-trial Conference on March 28, 2014 at 9:00 a.m. and Jury Selection on April 1, 2014 at 9:30 a.m.

II.

Counsel would show that discovery is ongoing but has not been completed. Additionally, discussions have been exchanged between the undersigned counsel and Assistant U.S. Attorney James H. Sturgis as to Defendant’s plea agreement, but such plea agreement still has not been finalized.

III.

Assistant United States Attorney James H. Sturgis was consulted and does not oppose this Motion. The majority of the other co-defendants, by and through their attorneys of record, have either filed motions to continue the above dates as of the filing of this motion or have been unopposed to the filing of said motions.

IV.

WHEREFORE, PREMISES CONSIDERED, HECTOR NICOLAS RODRIGUEZ, SR., Defendant in the above entitled and numbered cause, prays that the Court grant the foregoing Motion for Continuance and continue the Final Pre-trial Conference and Jury Selection for a period of sixty days.

Respectfully Submitted,

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BY: /s/ Daniel Quirino Longoria

Daniel Quirino Longoria

Texas State Bar Number 12543700

CERTIFICATE OF SERVICE

This is to certify that on the 24th day of March, 2014, a true and correct copy of the above and foregoing Motion for Continuance has been forwarded to all attorneys of record by electronic format - CM/ECF system.

/s/ Daniel Quirino Longoria

Daniel Quirino Longoria

CERTIFICATE OF CONFERENCE

I hereby certify that I have CONFERRED with AUSA James Sturgis and he is NOT OPPOSED to this Motion for Continuance.

/s/ Daniel Quirino Longoria

Daniel Quirino Longoria